

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, *ex rel.*
MICHAEL S. LORD,

Plaintiffs/Relator,

- v. -

NAPA MANAGEMENT SERVICES
CORPORATION, NORTH AMERICAN
PARTNERS IN ANESTHESIA
(PENNSYLVANIA), LLC, and POCONO
MEDICAL CENTER,

Defendants.

Civil Action No.: 3:13-CV-2940

JUDGE MANNION

ELECTRONICALLY FILED

MOTION FOR RECONSIDERATION

Under M.D. Pa. Local Rule 7.10 and Pennsylvania Rule of Professional Conduct 1.16(d) (“[u]pon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client’s interests”), Gerald Lawrence, Esq.; Scott V. Papp, Esq.; Sung-Min Lee, Esq.; and Lowey Dannenberg, P.C. (“Movants”) file this motion respectfully requesting that the Court reconsider its May 2, 2018 Order (D.E. 84) denying Movant’s Motion to Withdraw Appearance and to Stay Proceedings for 60 Days. D.E. 83.

Since Relator discharged them on April 26, 2018, applicable ethical rules prohibit Movants from acting on Relator’s behalf. Therefore, without a brief stay

of the proceedings, Relator's interests may potentially be prejudiced while he searches for new counsel.

WHEREFORE, Gerald Lawrence, Esq.; Scott V. Papp, Esq.; Sung-Min Lee, Esq.; and Lowey Dannenberg, P.C. respectfully request this Honorable Court to reconsider their Motion to Withdraw Appearance and remove their names from all future ECF notices after the date of the Order granting this Motion; and to stay this matter for sixty (60) days while Relator retains new counsel.

Dated: May 16, 2018

Respectfully submitted,

LOWEY DANNENBERG, P.C.

/s/ Gerald Lawrence, Esquire

Gerald Lawrence, Esquire
Four Tower Bridge
200 Barr Harbor Drive, Suite 400
West Conshohocken, PA 19428
Tel.: (610) 941-2760

LOWEY DANNENBERG, P.C.

Scott V. Papp, Esq.
Sung-Min Lee, Esq.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel.: (914) 997-0500

CERTIFICATE OF CONCURRENCE

The undersigned certifies that he sought concurrence from Defendants.

Counsel for Defendants consents to this Motion.

/s/ Sung-Min Lee, Esquire
Sung-Min Lee, Esquire

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CERTIFICATE OF SERVICE

SUNG-MIN LEE, ESQUIRE, hereby certifies that on the 16th day of May, 2018, he caused to be served true and correct copies of the foregoing document by ECF on all counsel of record.

LOWEY DANNENBERG, P.C.

/s/ Sung-Min Lee, Esquire
SUNG-MIN LEE, ESQUIRE